

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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In re : Chapter 9  
: Case No. 13-53846  
CITY OF DETROIT, MICHIGAN, :  
: Hon. Thomas J. Tucker  
Debtor. :  
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**STIPULATION BY AND BETWEEN THE CITY OF DETROIT, MICHIGAN AND  
IRON MOUNTAIN INFORMATION MANAGEMENT, LLC REGARDING  
EXTENSION OF DEADLINES TO (A) OBJECT TO REQUEST FOR PAYMENT OF  
ADMINISTRATIVE EXPENSE AND (B) REPLY TO LIMITED OBJECTION TO  
ASSUMPTION OF CONTRACTS AND PROPOSED CURE AMOUNTS**

The City of Detroit, Michigan (“City”) and Iron Mountain Information Management, LLC (“Iron Mountain”; and with the City, the “Parties”), file this Stipulation by and Between the City of Detroit, Michigan and Iron Mountain Information Management, LLC Regarding Extension of Deadlines to (A) Object to Request for Payment of Administrative Expense and (B) Reply to Limited Objection to Assumption of Contracts and Proposed Cure Amounts.

WHEREAS, on January 26, 2015, Iron Mountain filed its Reservation of Rights and Limited Objection to Assumption of Contracts and Proposed Cure Amounts (Doc. No. 9105) (“Objection”), asserting that it is owed a cure amount of \$354,122.06;

WHEREAS, on January 26, 2015, Iron Mountain filed its Request for Payment of Administrative Expenses Pursuant to 11 U.S.C. §503(b)(1) (Doc. No. 9106) (“Administrative Expense Request”), asserting that it is entitled to an administrative expense claim in the amount of \$134,508.32;

WHEREAS, Iron Mountain has also filed a rejection damage claim, a general unsecured claim, and a secured claim in this bankruptcy case (collectively, the “Additional Claims”); and

WHEREAS, the Parties have been working toward a consensual resolution of the Objection, the Administrative Expense Request, and the Additional Claims;

NOW, THEREFORE, the Parties stipulate and agree as follows:

1. The City's deadline to file a reply to the Objection is extended through and including July 1, 2015.
2. The City's deadline to file an objection to the Administrative Expense Request is extended through and including July 1, 2015.

STIPULATED AND AGREED TO ON MAY 4, 2015 BY:

By: /s/ Marc N. Swanson  
Jonathan S. Green (P33140)  
Marc N. Swanson (P71149)  
MILLER, CANFIELD, PADDOCK AND  
STONE, P.L.C.  
150 West Jefferson, Suite 2500  
Detroit, Michigan 48226  
(313) 963-6420  
[swansonm@millercanfield.com](mailto:swansonm@millercanfield.com)

ATTORNEYS FOR THE CITY OF DETROIT

By: /s/ Frank F. McGinn  
Frank F. McGinn (Mass. BBO # 564729)  
HACKETT FEINBERG P.C.  
155 Federal Street, 9<sup>th</sup> Floor  
Boston, MA 02110  
(617) 422-0200  
[FFM@bostonbusinesslaw.com](mailto:FFM@bostonbusinesslaw.com)

ATTORNEYS FOR IRON MOUNTAIN INFORMATION MANAGEMENT, LLC

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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In re : Chapter 9  
: Case No. 13-53846  
CITY OF DETROIT, MICHIGAN, :  
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**ORDER APPROVING STIPULATION BY AND BETWEEN THE  
CITY OF DETROIT, MICHIGAN AND IRON MOUNTAIN INFORMATION  
MANAGEMENT, LLC REGARDING EXTENSION OF DEADLINES TO  
(A) OBJECT TO REQUEST FOR PAYMENT OF ADMINISTRATIVE EXPENSE  
AND (B) REPLY TO LIMITED OBJECTION TO  
ASSUMPTION OF CONTRACTS AND PROPOSED CURE AMOUNTS**

Upon the Stipulation filed by the City of Detroit, Michigan (“City”) and Iron Mountain Information Management, LLC (“Iron Mountain”) regarding the Extension of Deadlines to (A) Object to Request for Payment of Administrative Expense and (B) Reply to Limited Objection to Assumption of Contracts and Proposed Cure Amounts; and the Court being otherwise advised in the premises;

**IT IS ORDERED THAT:**

1. The City’s deadline to file a reply to Iron Mountain’s Reservation of Rights and Limited Objection to Assumption of Contracts and Proposed Cure Amounts (Doc. No. 9105) is extended through and including July 1, 2015.
2. The City’s deadline to file an objection to Iron Mountain’s Request for Payment of Administrative Expenses Pursuant to 11 U.S.C. § 503(b)(1) (Doc. No. 9106) is extended through and including July 1, 2015.